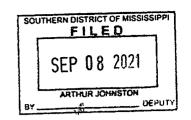
IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:21-Cr-100-TSL-LG

CRYSTAL HOLLIDAY, ASHTON CROUTHERS, and ANNIE J. BLALOCK 18 U.S.C. § 1349 18 U.S.C. § 1343 18 U.S.C. § 1028A(a)(1)

The Grand Jury charges:

COUNT 1

1. That beginning on or about December 11, 2019, and continuing through on or about December 25, 2019, the exact dates being unknown to the Grand Jury, in Neshoba County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, CRYSTAL HOLLIDAY, ASHTON CROUTHERS, and ANNIE J. BLALOCK, did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate and agree together and with others known and unknown to the Grand Jury to commit certain offenses against the United States, namely, wire fraud, in violation of Title 18, United States Code, Section 1343.

Object of the Conspiracy

2. It was the object of the conspiracy for the defendants to unjustly enrich themselves by using interstate wires to obtain funds by electronic means through the use of stolen and unauthorized identities of third parties, and thereafter spending down and withdrawing funds from the bank accounts of third parties, thereby defrauding third parties and institutions.

The Manner and Means of the Conspiracy

- 3. The manner and means by which the defendants and their co-conspirators sought to accomplish the objects of the conspiracy included, among other things, the following:
- 4. Defendant CRYSTAL HOLLIDAY who was employed by the Pearl River Resort as a cashier, would retain the personal identification information of individual third party customers who used the Resort's electronic check (E-Check) cashing service. After processing the third party's legitimate E-Check, CRYSTAL HOLLIDAY would use the personal identification information of third party customers to send fraudulent E-Checks to Global Payments Gaming Services, Inc., a company located outside of Mississippi. Global Payments Gaming Services, Inc., is a privately owned company that administers E-Check services to casinos and other businesses nationwide. CRYSTAL HOLLIDAY sent the fraudulent E-Checks by means of online transactions over the Internet.
- 5. Once the fraudulent E-Checks were transmitted and funds were available for payment, Defendants ASHTON CROUTHERS and ANNIE J. BLALOCK, and others known and unknown to the Grand Jury, falsely represented themselves as individual third party customers and signed for the E-Check funds. Defendant CRYSTAL HOLLIDAY would then pay out the E-Check funds to ASHTON CROUTHERS and ANNIE J. BLALOCK and others known and unknown to Grand Jury.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-5

6. Beginning on or about December 11, 2019, and continuing through on or about December 25, 2019, the exact dates being unknown to the Grand Jury, in Neshoba County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants,

CRYSTAL HOLLIDAY, ASHTON CROUTHERS, and ANNIE J. BLALOCK, did knowingly and with intent to defraud, devise and intend to devise a scheme and artifice to defraud financial institutions and third parties and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and did knowingly cause to be transmitted, by wire communication in interstate and foreign commerce, writings signs, pictures, and signals for the purpose of executing such scheme and artifice.

Purpose and Manner and Means of the Scheme and Artifice

7. Paragraphs 2 through 5 of Count 1 are incorporated by reference as though fully stated herein, as the purpose and manner and means of the alleged scheme and artifice.

Use of Interstate Wire Communications

8. On or about the dates listed below, in Neshoba County, in the Northern Division of the Southern District of Mississippi, and elsewhere, for the purpose of executing the aforesaid scheme and artifice to defraud, the defendants, CRYSTAL HOLLIDAY, ASHTON CROUTHERS, and ANNIE J. BLALOCK, did knowingly transmit and cause to be transmitted, in interstate and foreign commerce, by means of wire communications, certain writings, signs, signals, pictures and sounds, as more particularly described for each count below:

COUNT	DATE	WIRE COMMUNICATION		
2	Dec. 13, 2019	Online submission of fraudulent E-Check to Global Payments		
		Gaming Services, Inc. in the amount of \$2,030.		
3	Dec. 15, 2019	Online submission of fraudulent E-Check to Global Payments		
		Gaming Services, Inc. in the amount of \$3,530.		
4	Dec. 21, 2019	Online submission of fraudulent E-Check to Global Payments		
		Gaming Services, Inc. in the amount of \$2,930.		
5	Dec. 25, 2019	Online submission of fraudulent E-Check to Global Payments		
		Gaming Services, Inc. in the amount of \$2,930.		

All in violation of Title 18, United States Code, Section 1343.

COUNTS 6-9

9. On or about the dates specified as to each Count below, in Neshoba County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, CRYSTAL HOLLIDAY, ASHTON CROUTHERS, and ANNIE J. BLALOCK, and others known and unknown to the Grand Jury, during and in relation to a felony violation of Title 18, United States Code, Sections 1343, as indicated below, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person as set forth in each Count below:

COUNT	APPROXIMATE DATE	MEANS OF IDENTIFICATION	PREDICATE COUNTS
6	Dec. 13, 2019	Name, Pin Number, Bank Account Number of "B.S."	Count 2
7	Dec. 15, 2019	Name, Pin Number, Bank Account Number of "W.J."	Count 3
8	Dec. 21, 2019	Name, Pin Number, Bank Account Number of "W.F."	Count 4
9	Dec. 25, 2019	Name, Pin Number, Bank Account Number of "R.C."	Count 5

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been

commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and (a)(2); and Title 28, United States Code, Section 2461(c).

DARREN J LAMARCA Acting United States Attorney

A TRUE BILL: S/SIGNATURE REDACTED Foreperson of the Grand Jury

UNITED STATES MAGISTRATE JUDGE